

### **REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

#### ***Specification***

The specification has been carefully reviewed, and previously undiscovered typographical errors have been corrected by way of amendment to paragraphs [0011], [0012] [0061] and [0062]. No new matter has been added.

#### ***Claim Rejections-35 U.S.C. § 103(a)***

The Office Action rejected claims 1-5, 9, 10 and 12-20 under 35 U.S.C. 103(a) as being unpatentable over Applicant's above-identified issued patent (Dallas) in view of Dearing et al. Applicant respectfully traverses the rejection for at least the reasons set forth below.

Neither Dearing nor Applicant's issued patent suggest, teach or provide any motivation that would lead one skilled in the art to the claimed invention. Dearing teaches at paragraph [0008]: "In this invention, a pair of tubing strings are simultaneously run into a well for a variety of reasons. One may be to provide a down hole pump of some description, to provide multiple strings for injecting materials into the well and the like." Dearing further teaches at paragraph [0042]: that a "wheel 114 preferably includes first and second grooves 142 of a predetermined size. Typically, the first and second grooves 142 are of the same size and are used to propel spooled tubing strings 48, 50 of the same size into the well 28. In the alternative, the grooves 142 may be of a different size. Ideally, the wheel 114 includes additional grooves 144 of a size different than the grooves 142 [see Fig. 11]. This allows the spooled tubing unit 10 to run different sized tubing strings into the well 28 without replacing the wheel 114."

That is, Dearing teaches that a coil tubing injector may be configured to insert various different sizes of coil tubing. Regardless whether the user inserts strings individually or simultaneously, only one wheel is needed at the job site. One skilled in the art should recognize, however, that when used to drive multiple strings simultaneously, the Dearing chain 148 would effectively drive the multiple tubing strings only if they were of the same diameter. Referring to Dearing Figure 11, metal rollers 149 would only effectively engage the largest diameter string received by the grooves in wheel 114. Thus, while the chain might effectively grip strings of different sizes individually or multiple strings of the same diameter simultaneously, it would not

effectively grip multiple differently-sized strings simultaneously. For at least this reason, Dearing provides no motivation to modify Dallas to simultaneously grip coil tubing strings of three different diameters, as required by claims 1, 9 and 19.

Claims 2-5 and 14-18 depend from independent claim 1. Claims 12 and 13 depend from independent claim 10, and claim 20 depends from independent claim 19. These dependent claims recite further limitations and are allowable in their respective combinations.

Claim 1 has been amended to clarify that the gripper blocks simultaneously grip coil tubing strings of different diameters. Similarly, claim 19 has been amended to clarify that at least three differently-sized coil tubing strings are gripped. Claims 3 and 4 have been amended to clarify antecedent basis.

In view of the amendments to the specification, claims and for all the reasons set forth above, this application is now considered to be in a condition for immediate allowance. Favourable reconsideration and early issuance of a Notice of Allowance are thereby requested.

Respectfully submitted,

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& SCARBOROUGH, L.L.P.

A handwritten signature in black ink, appearing to read "Lloyd G. Farr", is written over a horizontal line.

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